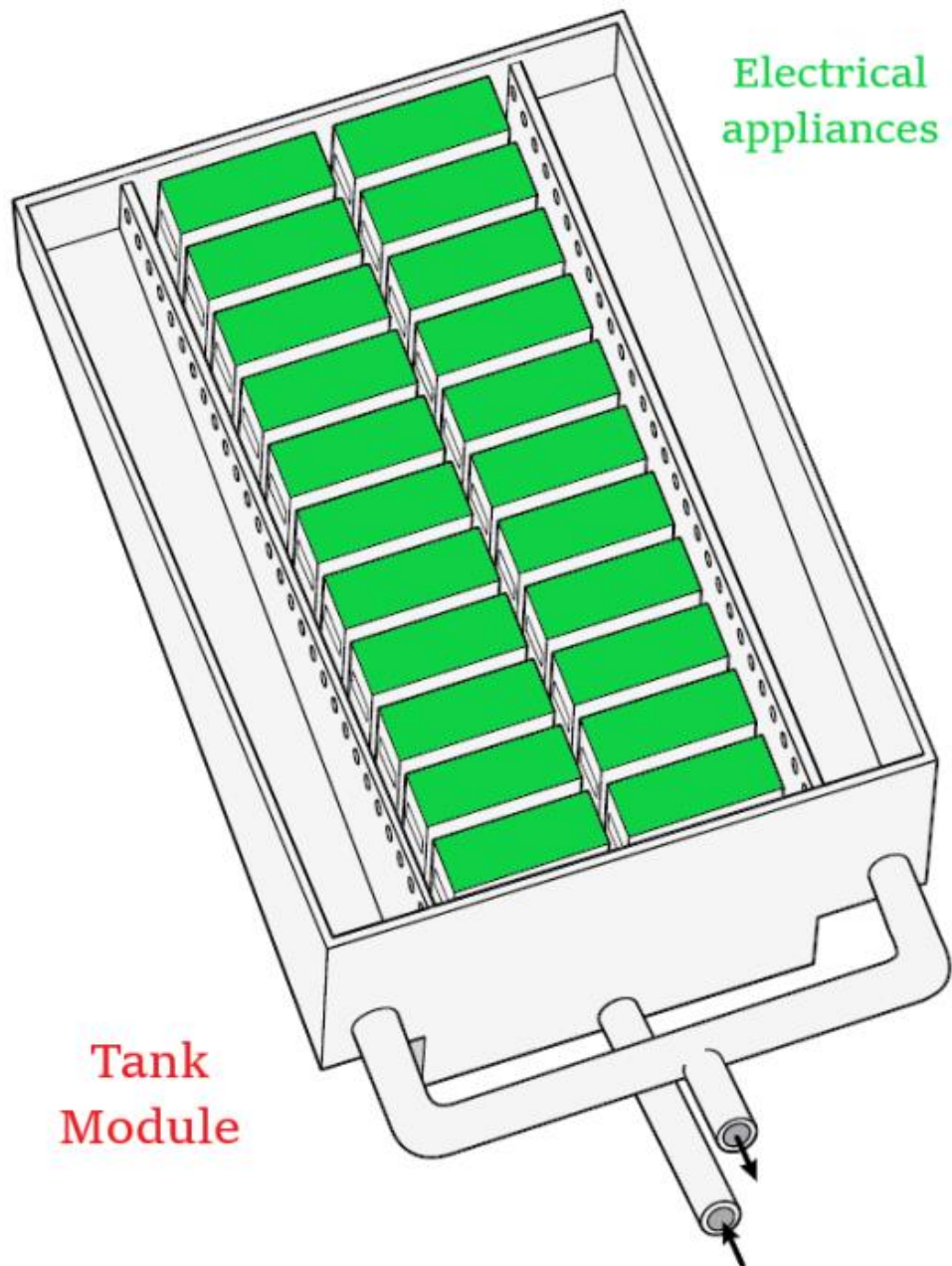


# EXHIBIT D

## '446 Patent, Claim 6 Claim Chart

Claim Elements	Infringement by the Accused Rhodium Instrumentality
6. A tank module adapted for use in an appliance cooling system, the tank module comprising:	<p>Accused infringers Rhodium Technologies LLC and Rhodium Enterprises, Inc. and their subsidiaries (together "Rhodium"), as well as the individual defendants, own, develop, acquire, and use tank modules adapted for use in an appliance cooling system (the Accused Instrumentality).</p> <p>Rhodium is "an industrial-scale digital asset technology company" that mines bitcoin with a "fully integrated infrastructure platform" that includes "directly owning and operating [its] own customized mining sites." Amendment No. 4 to Form S-1 at 1, Rhodium Enterprises, Inc. (filed Dec. 14, 2021), <i>available at</i> <a href="https://sec.report/Document/0001213900-21-065116/fs12021a4_rhodium.htm">https://sec.report/Document/0001213900-21-065116/fs12021a4_rhodium.htm</a>. "The cornerstone of [Rhodium's] infrastructure platform is [its] liquid-cooling technology" which is "uniquely designed" to "maintain low operating costs and manage energy consumption." <i>Id.</i> Rhodium "design[s], build[s], operat[es], and maintain[s]" tank modules adapted for use in a liquid appliance cooling system. <i>Id.</i> ("Our technology allows us to submerge our bitcoin miners in the fluid"); <i>see also id.</i> at 58 ("We own specialized computers ('miners')"); "Miners are comprised of sensitive electrical equipment").</p> <p>On information and belief, the below drawing approximately depicts the tank module of Accused Instrumentality which is adapted for use in an</p>

appliance cooling system (the tank module also includes the control facility, which is not depicted below):



a. A tank adapted to immerse in a dielectric fluid a plurality of electrical appliances,

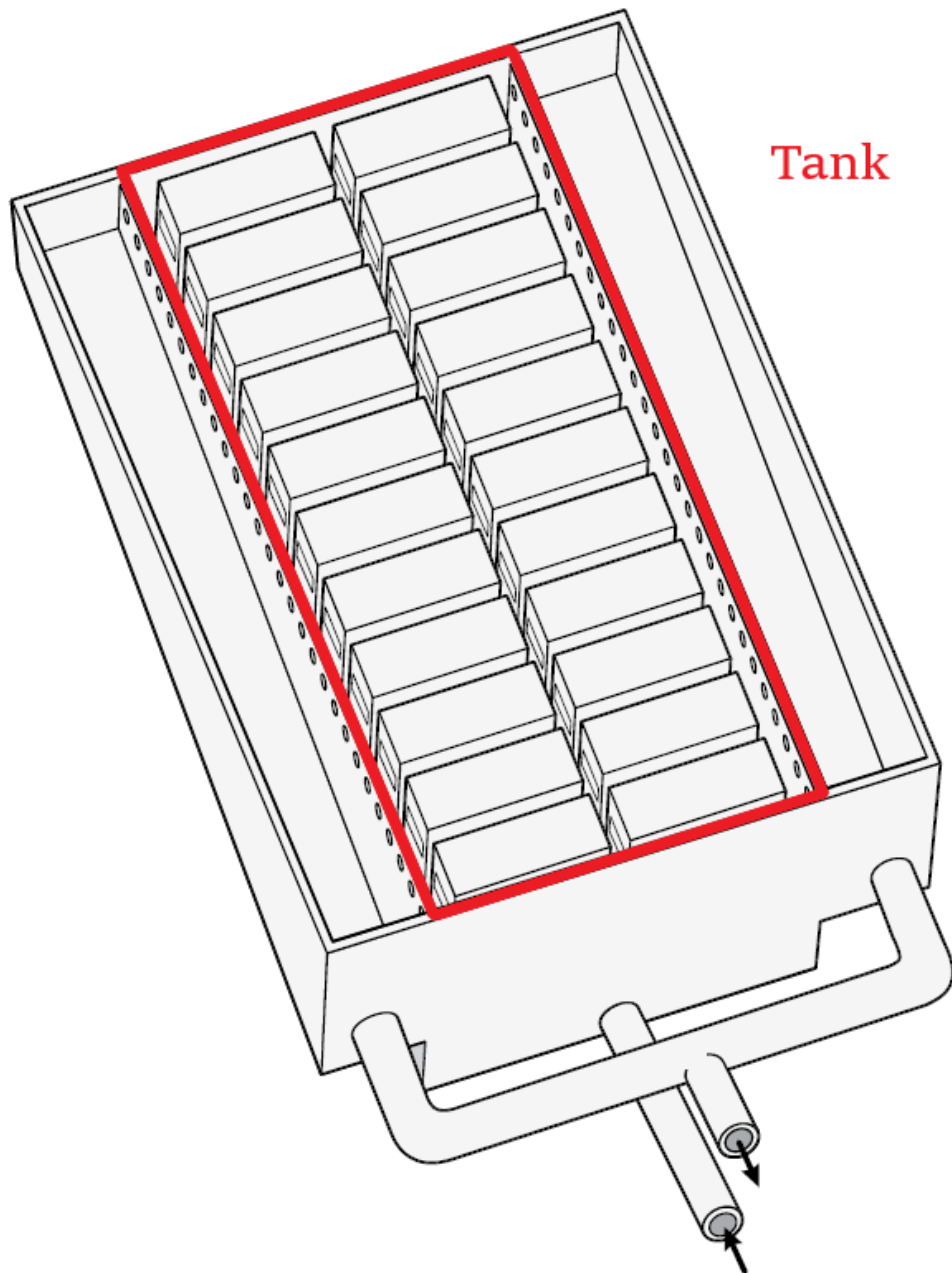
The Accused Instrumentality includes a tank adapted to immerse in a dielectric fluid a plurality of electrical appliances, each in a respective appliance slot distributed vertically along, and extending transverse to, a long wall of the tank.

Specifically, the tank holds dielectric fluid in which Rhodium's mining computers, i.e. electrical appliances, are submerged. See SEC Form 1 at 78 ("Liquid-cooling technology, on the other hand, reduces these issues

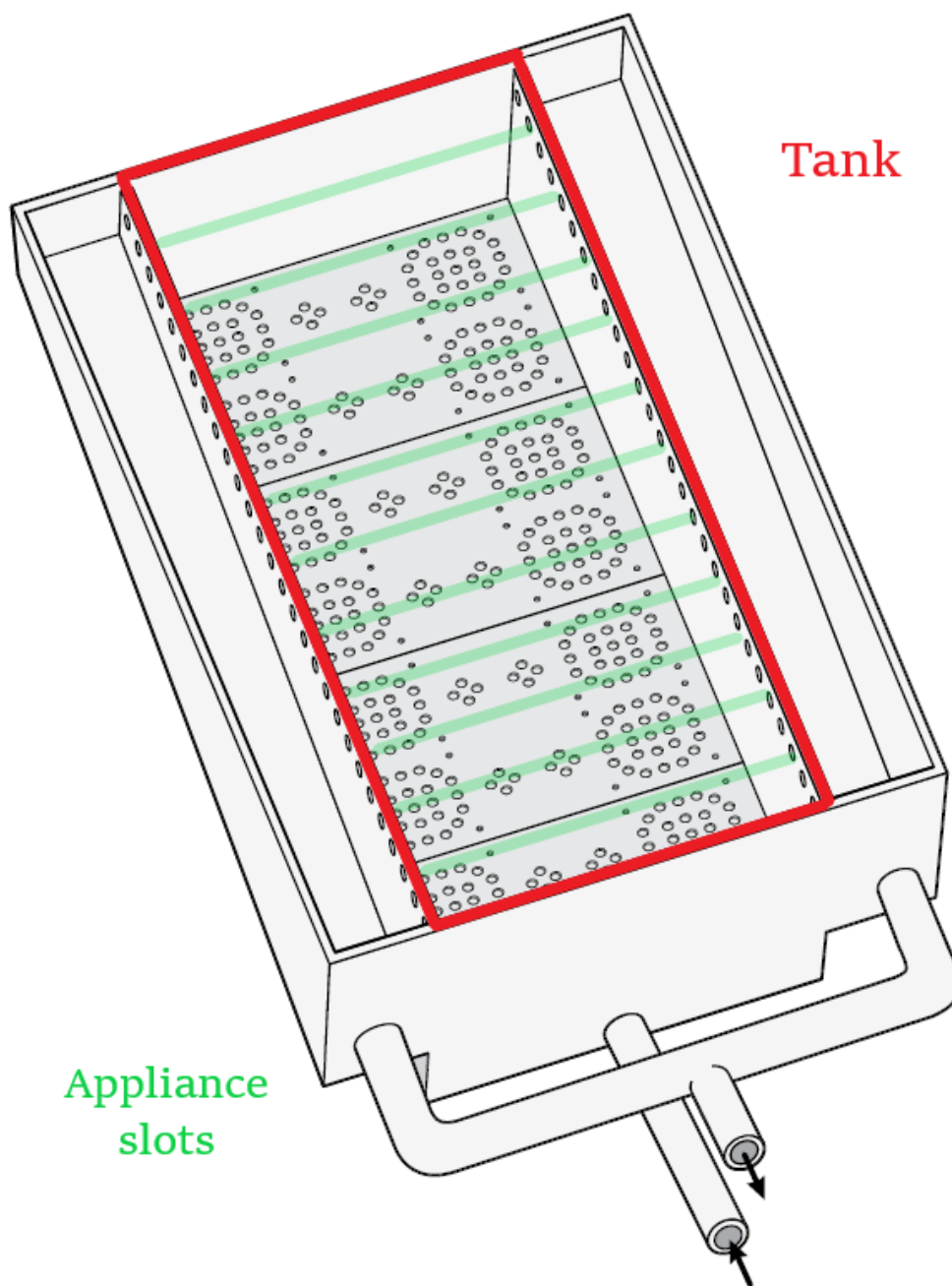
each in a respective appliance slot distributed vertically along, and extending transverse to, a long wall of the tank, the tank comprising:

by submerging miners in a dielectric, oil-based fluid that creates an environment more conducive to efficient heat extraction and transfer.”); *id.* at 1 (“Our technology allows us to submerge our bitcoin miners in the fluid”).

On information and belief, the below drawing approximately depicts a Rhodium tank (with electrical appliances installed) :

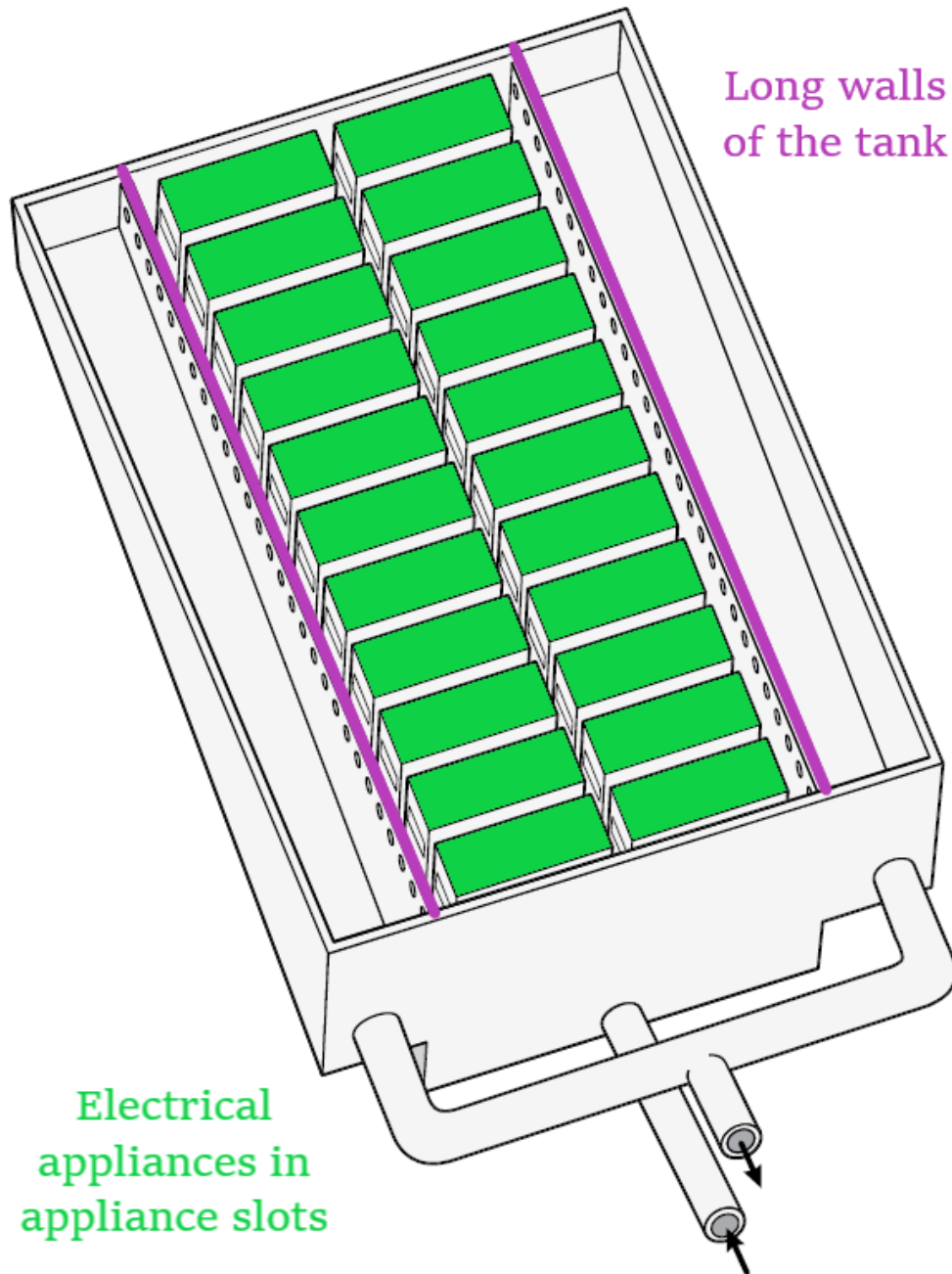


On information and belief, the below drawing approximately depicts the tank without the installed electrical appliances:



On information and belief, in use, the tank is filled with dielectric fluid, and a plurality of electrical appliances (i.e. bitcoin mining computers, the tops of which are depicted in green) are placed in respective

appliance slots distributed vertically along, and extending transverse to, a long wall of the tank, as shown in approximation below:



i. A weir, integrated

The tank of Rhodium's Accused Instrumentality includes a weir,<sup>1</sup> integrated horizontally into the long wall of the tank adjacent all

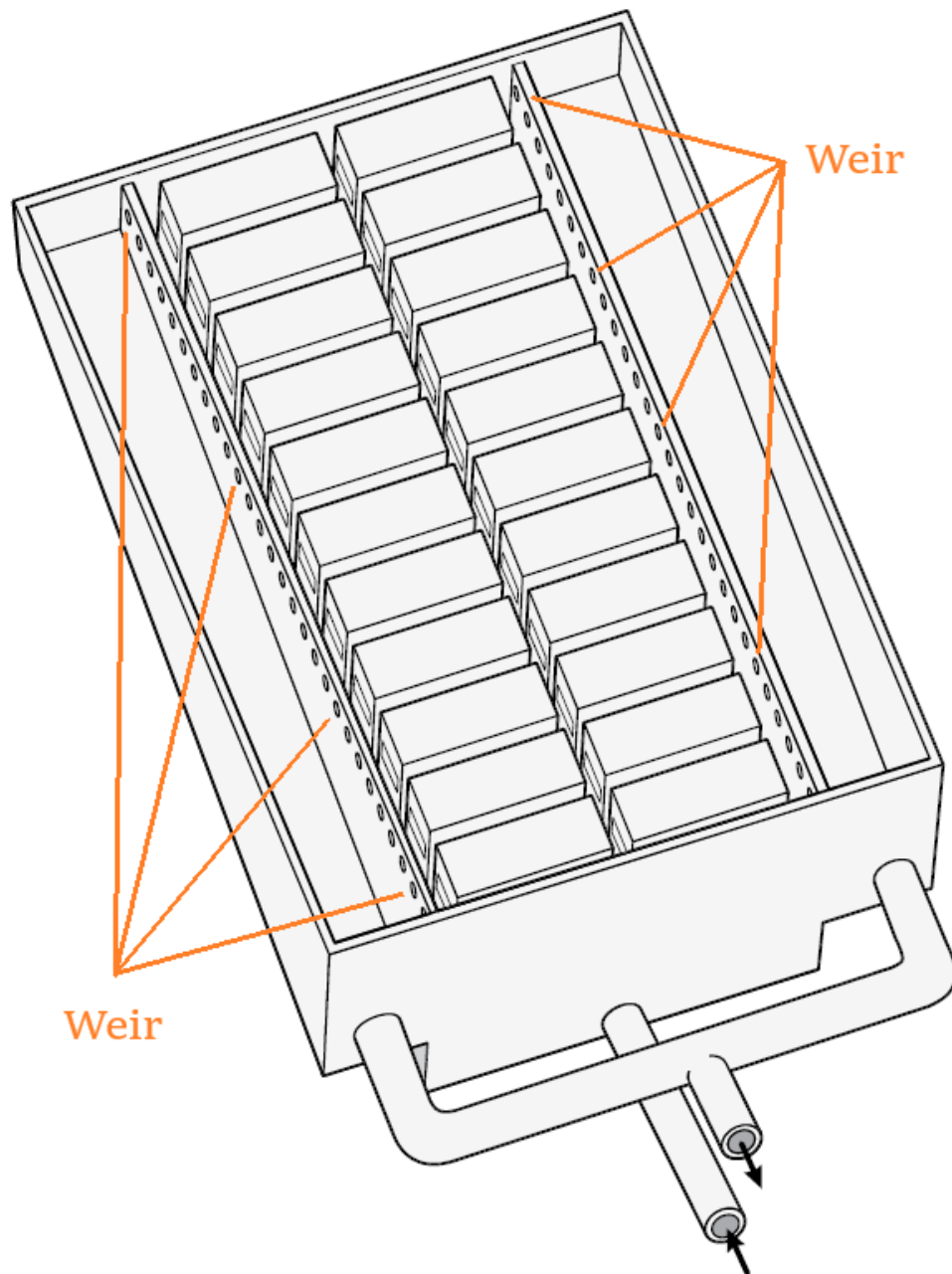
<sup>1</sup> The Court in *Midas Green Technologies, LLC v. Immersion Systems LLC* has adopted the parties' agreed construction for the term "weir," construing it to mean "an overflow structure or barrier that determines the level of liquid". See Dkt. 84, at 9 (referring Dkt. 82-1, at 2.)



horizontally into the long wall of the tank adjacent all appliance slots, adapted to facilitate substantially uniform recovery of the dielectric fluid flowing through each appliance slot; and;

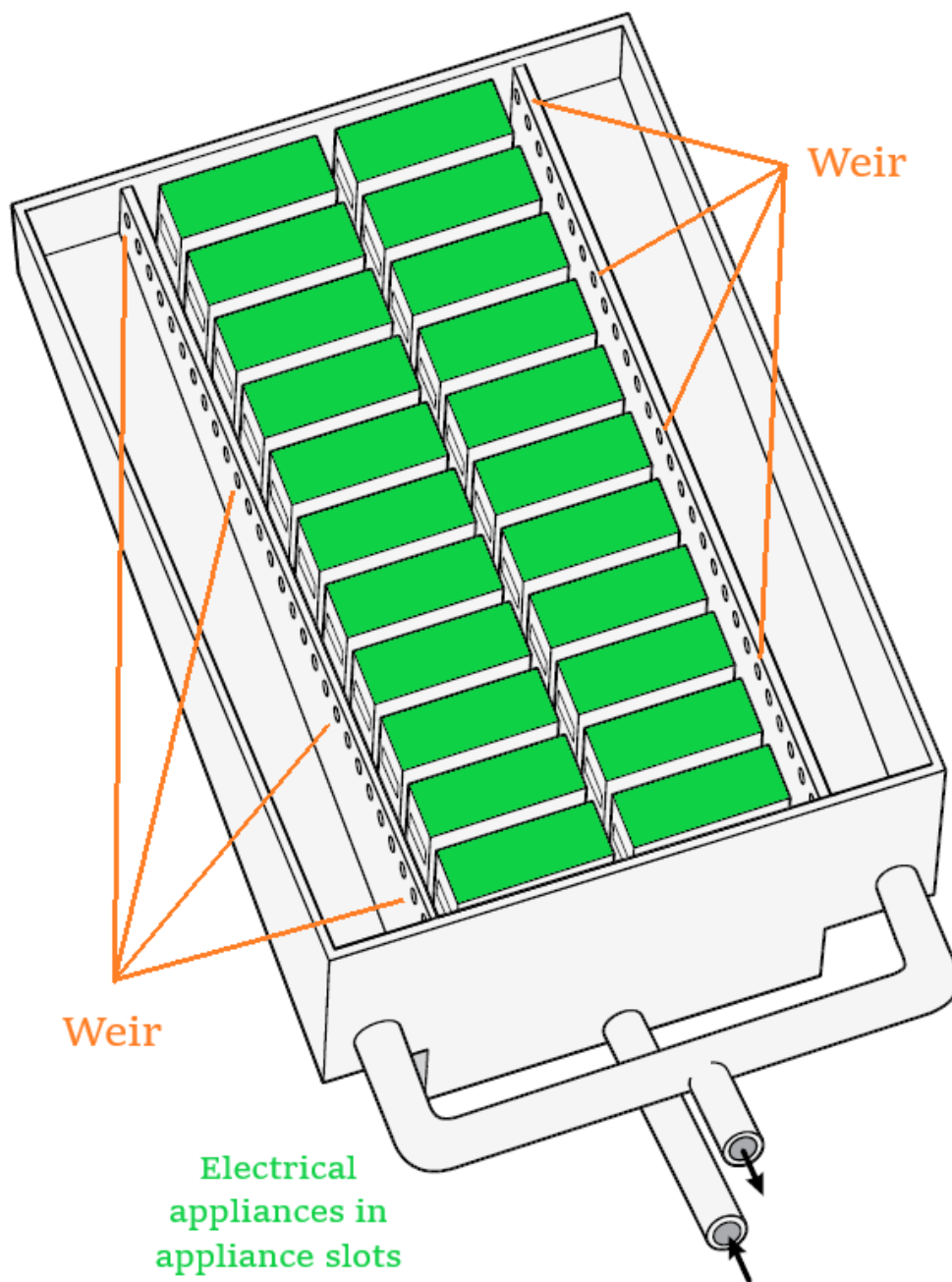
appliance slots, adapted to facilitate substantially uniform recovery of the dielectric fluid flowing through each appliance slot. Specifically, the tank includes circular holes that comprise a weir. There are weirs on both sides of the tank.

On information and belief, the below drawing approximately depicts the two weirs of Rhodium's Accused Instrumentality:



The weir is integrated horizontally into the long wall of the tank adjacent to the appliance slots and the weir is adapted to facilitate substantially

uniform recovery of the dielectric fluid flowing through each appliance slot.



b. A primary circulation facility adapted to circulate the dielectric

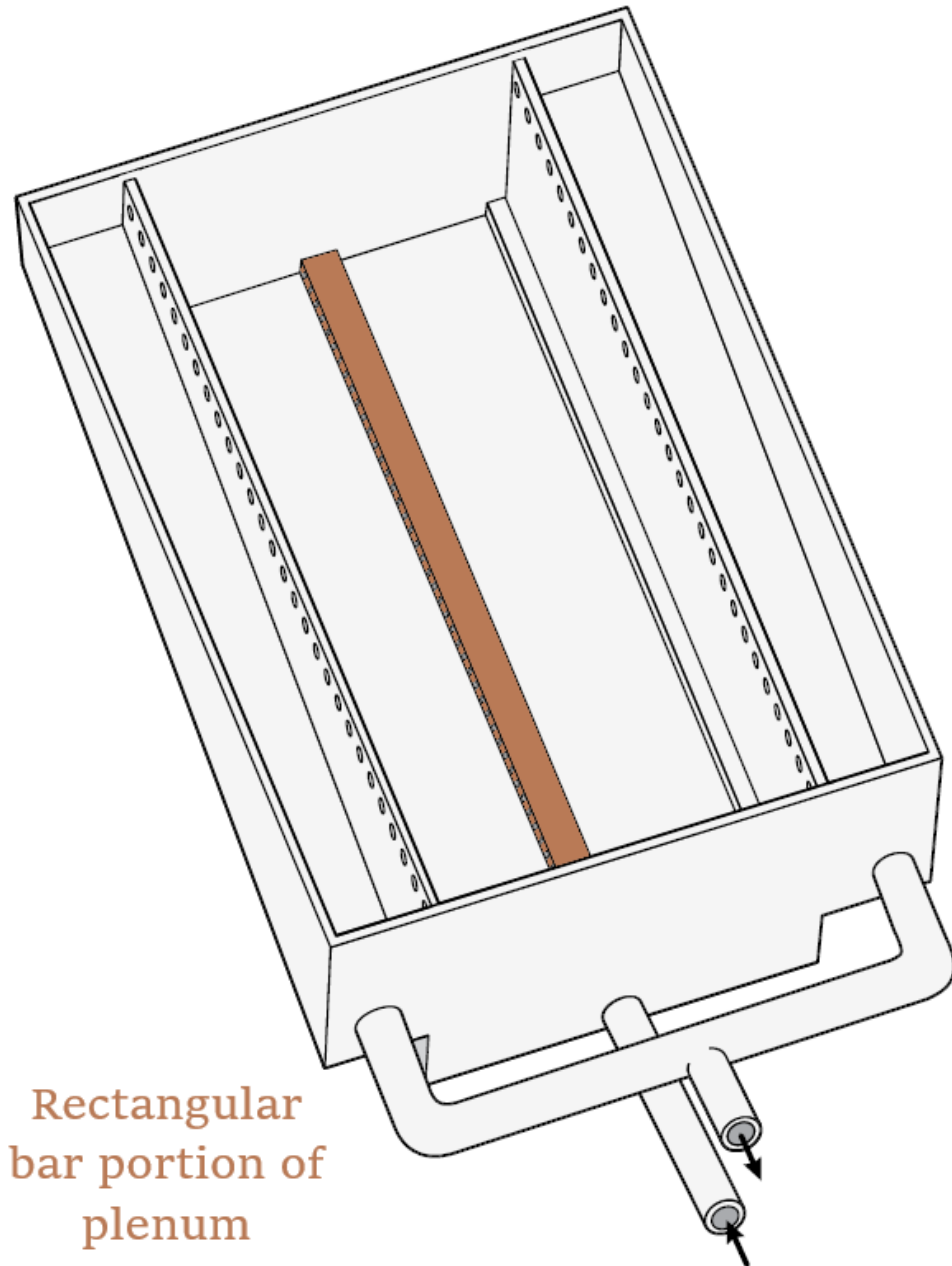
The Rhodium Accused Instrumentality includes a primary circulation facility adapted to circulate the dielectric fluid through the tank (as detailed below).

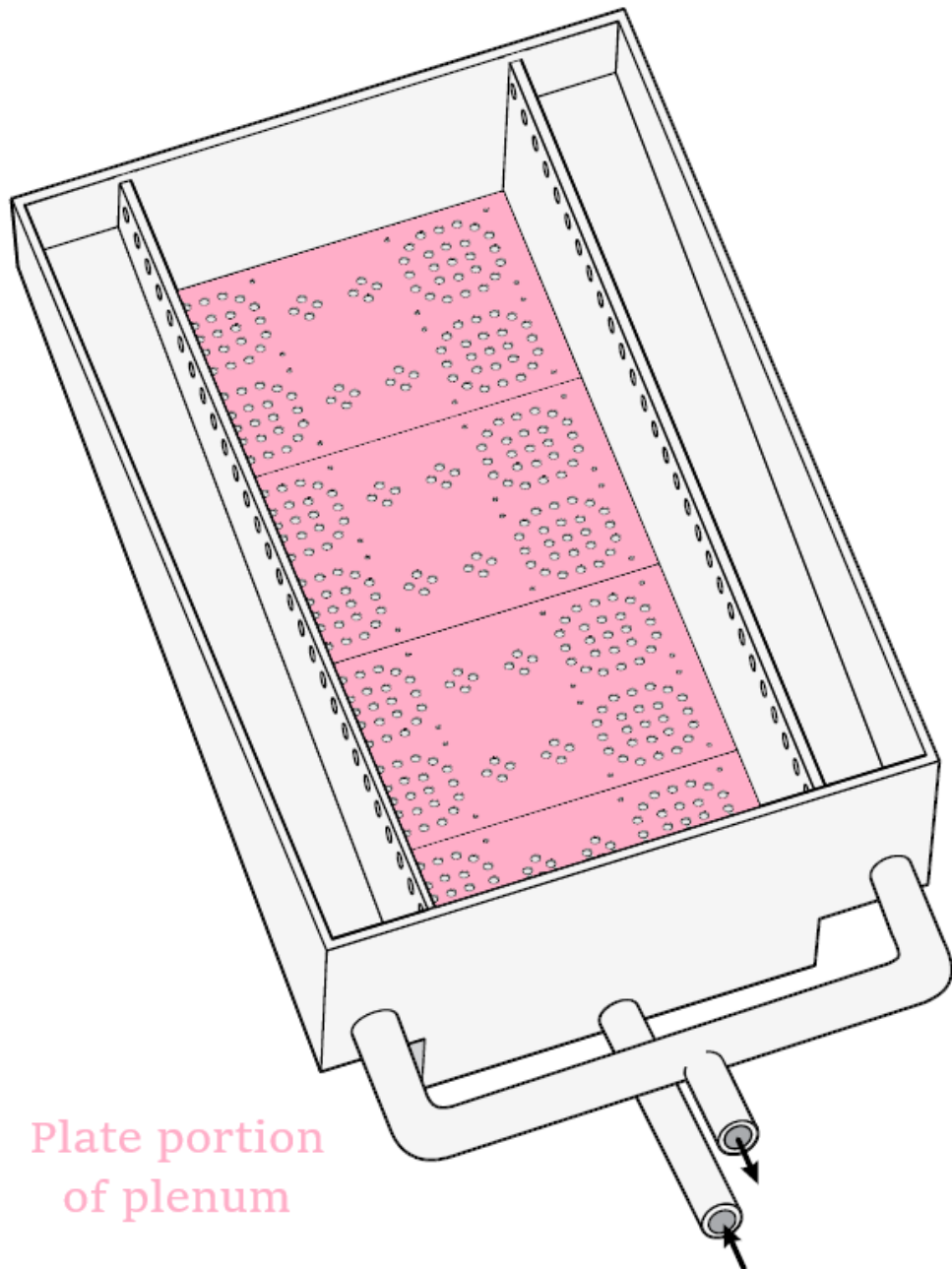


fluid through the tank, comprising:	
i. A plenum positioned adjacent the bottom of the tank, adapted to dispense the dielectric fluid substantially uniformly upwardly through each appliance slot; and	<p>The Rhodium Accused Instrumentality includes a plenum<sup>2</sup> positioned adjacent the bottom of the tank, adapted to dispense the dielectric fluid substantially uniformly upwardly through each appliance slot.</p> <p>Specifically, the plenum of the Rhodium Accused Instrumentality includes two components: (1) a rectangular bar or pipe that is adjacent to the bottom of the tank with circular holes in either sides that are adapted to dispense fluid substantially uniformly upwardly through each appliance slot; and (2) plates with a certain pattern of circular holes, where the plates are placed above the top of the rectangular bar or pipe and extending horizontally across the bottom of the entire tank, also adjacent to the bottom of the tank. The plates with their patterns of circular holes are adapted to dispense fluid substantially uniformly upwardly through each appliance slot. The dielectric fluid flows out of the holes of the first component then through the holes of the second component and up through each appliance slot substantially uniformly.</p> <p>On information and belief, the below drawings approximately depict each component of the plenum.</p>

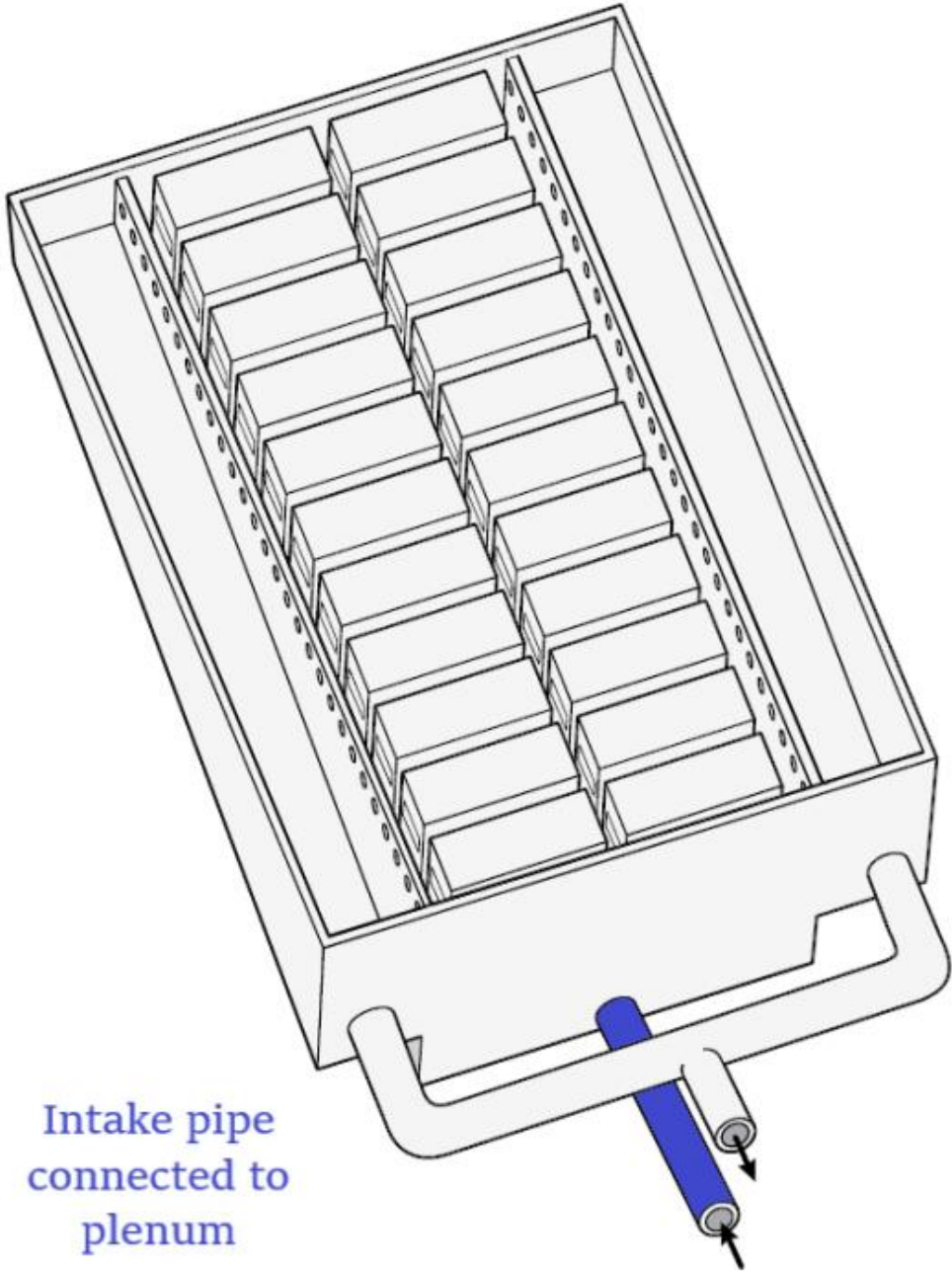
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<sup>2</sup> The Court in *Midas Green Technologies, LLC v. Immersion Systems LLC* has adopted the parties' agreed construction for the term "plenum," construing it to mean "a structure for dispensing liquid". See Dkt. 84, at 9 (referring Dkt. 82-1, at 3.)





The below drawing depicts the dielectric fluid inlet pipe connected to the plenum, below the outtake pipe that is connected to the dielectric fluid recovery reservoirs:

	 <p>Intake pipe connected to plenum</p>
<p>c. A control facility adapted to control the operation of the primary fluid circulation facility as a function of</p>	<p>On information and belief, in operation, the Rhodium Accused Instrumentality's tank module includes a control facility adapted to control the operation of the primary fluid circulation facility as a function of the temperature of the dielectric fluid in the tank.</p> <p>Specifically, the control facility includes an automated controller with software that monitors and controls the pumps, dry coolers, and temperature of the dielectric fluid in the tanks through the use of sensors. <i>See, e.g.,</i> Amendment No. 4 to Form S-1 at 74, Rhodium Enterprises, Inc. (filed Dec. 14, 2021), available at</p>

the temperature of the dielectric fluid in the tank.	<p><a href="https://sec.report/Document/0001213900-21-065116/fs12021a4_rhodium.htm">https://sec.report/Document/0001213900-21-065116/fs12021a4_rhodium.htm</a> (“Additionally, we have developed and maintained proprietary software to optimize performance of our miners and infrastructure in real-time . . . . Specifically, our software allows us to make quicker, and data-informed, decisions, securely and rapidly put miners online and more effectively manage temperature and energy.”); <i>id.</i> at 79 (“In tandem to developing our own software, we employ sensors not only telling us the temperature of each miner in real-time through visual heat maps, but we have also installed microsensors throughout our liquid-cooling plumbing system that measure flow rate, temperature and presume. Using machine learning technology and the data points collected by these sensors, robotic process automation (RPA) triggers a tuning response to the power intake as needed to either remediate or optimize miner performance.”).</p>
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